

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

Brad J. Spiller, Esq.

BRENNER, BRENNER & SPILLER

175 Richey Avenue

Collingswood, NJ 08107

(856) 963-5000

Attorneys for Debtor

In Re:

Miguel Figueroa and Iluminida Figueroa,

Debtors

Case No.: 16-32055 (ABA)

Chapter: 13

Hearing Date: _____

Judge: Andrew B. Altenburg, Jr.

OPPOSITION TO APPLICATION FOR EARLY TERMINATION OF LOSS MITIGATION PERIOD

I, Miguel Figueora, one of the debtors in this case, submit this Opposition to my mortgage company's application for early termination of loss mitigation period.

1. I am fully familiar with the facts set forth below.
2. My wife and I applied for a loan modification and we were denied.
3. We appealed that decision and that was denied as well.
4. Our daughter and granddaughter have since moved in with us and are now contributing to the household expenses.
5. We are now going to file another appeal and hopefully the mortgage company will reconsider the denial.
6. I am respectfully requesting that the Court allow me to stay in Loss Mitigation so that I can save my home.

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Date: April 17, 2017

/s/ Miguel Figueroa
Miguel Figueroa